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**Waukegan Port District • Waukegan Regional Airport
Waukegan Harbor**

February 3, 2009

Submitted via Electronic
And U.S. Mail

Mr. Kevin Adler
Remedial Project Manager
U.S. Environmental Protection
Agency-Region 5 (SR-6J)
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Subject: Waukegan Harbor Proposed Cleanup Plan Comment

Dear Mr. Adler:

I have reviewed the October 2008 Feasibility Study Report for the OMC Waukegan Harbor Site and the Proposed Cleanup Plan. I support the U.S. Environmental Protection Agency's proposed Remedial Action Objectives (RAO) for the polychlorinated biphenyls (PCBs).

Regarding the proposed Remedial Action Alternatives, the Waukegan Port District is in the process of developing an alternate concept to construct an in-water confined disposal facility (CDF) to be generally located south of the federal pier and east of the South Harbor marina. It is our opinion that this concept will provide the Agency with a potentially significant cost savings alternative to contain the dredged material as well as provide a beneficial end land use alternative to expand the recreational marina for the benefit of the public creating an opportunity for commerce development. Such precedence has been established elsewhere throughout the Great Lakes.

The Port District has developed a preliminary cost to construct the CDF. In addition, independently of the proposed USEPA action, the Port District is continuing with an ongoing facility improvement action which will generate approximately 80,000 yds³ of dredge materials from the South Harbor recreational marina. In anticipation of the remediation activity proposed by the USEPA cleanup action, the Port District wishes to explore cost savings to both governmental agencies by directly placing the South Harbor Marina removed sediments on top of the CDF as a cover material. At this time, we are further exploring and attempting to confirm with the U.S. Army Corps of Engineers the details of constructing an in-water CDF. The Port District has only recently been in contact with the U.S. Army Corps of

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Engineers to discuss the requirements and potential costs to implement this alternative. The Port District wishes for the USEPA to further evaluate this concept as part of the value engineering for the upcoming design phase.

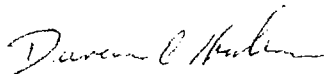
Finally, I would be pleased to further explore with the USEPA and the other harbor businesses during the preliminary design the alternative to dredge the navigational channel to facilitate removal of as much contaminated material from Waukegan Harbor as possible. We understand that the additional costs are not necessary to achieve the stated RAO. It however seems financially prudent for the impacted businesses and governmental agencies, such as the Port District and the USEPA, to meet to make a fully informed decision by evaluating and identifying the future industrial/commercial needs to understand the potential significant costs savings by coordinating the deeper dredging alternative with the proposed remediation activity.

Please feel free to contact me or the Port District's consultant, Thomas J. Thomas of T.J. Thomas Associates, Inc. at 630-243-8775 for any additional information. We are available to further discuss this alternative at your convenience.

We look forward to working with you and the USEPA on this exciting opportunity.

Sincerely,

WAUKEGAN PORT DISTRICT



Duncan C. Henderson, A.A.E.
Executive Director

CC: Erin Rednour, IEPA
Hon. Mark S. Kirk
Hon. Melissa L. Bean